RETAIL ENERGY CODE

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01	Initial Assessment Report
02	Preliminary Change Report
03	Final Change Report

FINAL CHANGE REPORT

R0012 – HOUSEKEEPING AMENDMENTS TO REC V2

DOCUMENT VERSION	1.0
DATE ISSUED	10/12/2021
DOCUMENT STATUS	PRE-VOTE

RESPONSIBLE COMMITTEE	CHANGE PANEL

LEAD ANALYST	Jon Hawkins	EMAIL

CHANGE OVERVIEW

	High Impact: None
	Medium Impact: None
	Low Impact: Energy Suppliers, Distribution Network Operators, Gas Transporters, Metering Equipment Managers, Data Collectors, Meter Administrators

This change seeks to update the REC with missing Change Proposals that were implemented in previous codes, prior to the implementation of REC V2, that should have been included in the REC V2 drafting. This change also seeks to correct omissions and typographical errors identified by the Code Manager since the implementation of REC V2.

CODE MANAGER'S RECOMMENDATION

The Code Manager recommends Change Proposal R0012 is **APPROVED** for implementation on 31 January 2022.

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RETAIL ENERGY CODE

BACKGROUND

1 SUMMARY

REC version 2 was implemented by the Authority as part of the Retail Code Consolidation Significant Code Review and took effect on 01 September 2021. The REC V2 drafting was subject to Switching Programme change control to ensure that changes being made to previous codes would be reflected in the REC V2 drafting.

The Code Manager has identified some Change Proposals, implemented in previous codes, that were not reflected in the REC V2 drafting, as well as other omissions and typographical errors in the Code. These need to be corrected to ensure the REC accurately reflects the provisions migrated from previous codes.

The following Change Proposals were implemented into previous codes but have not been reflected in the REC V2 drafting:

- BSC CP1530 – Introduction of a formalised process for the validation of measurement transformer ratios by Elexon
- BSC CP1534 – Introduce Change of Supplier (CoS) – No Meter Process
- SPAA CP 509 – Changes to Backstop Date
- DTC CP 3572 – Changes to the D0268 (Half Hour Meter Technical Details)
- DTC CP 3578 – Sending UMS HH data from the Meter Administrator to HHDC
- SPAA CP 476 – Obligations to pass Transporter compensation payments received from Shippers on to consumers
- MAP CP 0339 - Changes to MAP 14 to incorporate a procedure for working Unallocated Transactions

Other omissions or errors from the REC V2 drafting were:

- Former MRA Schedule 6 - Appendix 1 (MPAS Non-Functional Requirements) is missing from the MRA Transition Schedule.
- Former MRA Schedule 5 (Supply Number Format) is missing from the Data Specification.
- Former SPAA Schedule 18 – Appendix 1 (Guidance on treatment of remotely retrieved meter readings from SMETS2+ gas meters) is missing from the Data Specification.
- Definition of 'Working Days' references Scottish Bank Holidays and should only reference England and Wales.

Other typographical and housekeeping updates identified by the Code Manager.

2 PROBLEM STATEMENT

The implementation of REC V2, as part of the Retail Code Consolidation SCR, was due to consolidate the existing provisions in other codes into the REC on a like-for-like basis. The Code Manager has identified that there were changes made to previous codes that weren't reflected in the REC V2 drafting that was implemented. This means that the current processes being operated by industry parties are not reflected in the REC.

REC Parties and Service Providers rely on the REC to provide a consistent baseline to ensure the industry operate in an effective and interoperable way. There are currently inconsistencies between the drafting of the REC, and the processes operated by REC Parties and Service Providers, which could cause issues in the effective operation and assurance of the retail energy market.

3 USER STORIES

REF.	USER STORIES
CONSUMER USER STORIES	
C1	As an Energy Consumer, I need Energy Companies to operate consistent processes, to ensure my energy supply is managed efficiently and to retain my trust in the functioning of the energy market.
MARKET PARTICIPANT USER STORIES	
M1	As a REC Party, I need the REC to provide a consistent baseline, so I can operate in an interoperable way with other Market Participants.

PROPOSAL

4 KEY RISKS, ASSUMPTIONS, ISSUES AND DEPENDENCIES

4.1 RISKS AND ISSUES

No.	RISK	NOTES	MITIGATION
R1	There is a risk that there are other omissions from the REC that haven't been identified by the Code Manager.	There may be other omissions or inaccuracies in the REC that have not been identified by the Code Manager in this Change Proposal. The Code Manager does not propose to delay the progression of this Change Proposal to complete a full review of all REC Schedules but will continue to review these periodically and	Since being made aware of these issues, the Code Manager has reviewed previous Change Proposals in the MRA and SPAA, and had meetings with the BSC, to confirm there are no other missing Change Proposals in the REC. If other issues are identified during the course of progressing this Change Proposal, a decision will be made on whether to

		address any future issues if they arise.	incorporate these into this Change Proposal, or to include them in a future Change Proposal.

4.2 ASSUMPTIONS AND DEPENDENCIES

No.	ASSUMPTION	NOTES	HOW/WHEN TO VALIDATE
A1	There are no other missing Change Proposals that were not included in the REC V2 drafting implemented by the Switching Programme.	The Code Manager has initially reviewed other recent Change Proposals in the MRA and SPAA, and have had meetings with the BSC, to confirm that there are no other implemented Change Proposals missing from the REC.	No additional issues were identified during the consultation period.

5 PROPOSED SOLUTION

The following changes have been proposed to REC Schedules:

- Interpretation and Definitions Schedule
    - Change to definition of 'Backstop Date' to reflect solution introduced through SPAA CP 509.
    - New definition for 'Non-Half Hourly Metering Point'.
    - Remove definition for 'Performance Standards' as this isn't used in the Code.
    - Amend definition for 'Working Day' to remove reference to Scottish Bank Holidays.
    - Amend erroneous reference to “Electricity Registration Data Service” and “Gas Registration Data Service” to “Electricity Retail Data Service” and “Gas Retail Data Service”.
    - Amend definition for “RECCo” to reference Clause 5 of the Main Body, instead of Clause 6.
    - Remove duplicate definition of “EES Provider” as this is already defined as “Electricity Enquiry Service Provider”.
    - New definition of “Customer Specific Message”.
    - Added acronym of “NSP” to definition of “Prepayment Network Service Provider” and expanded definition to reference all prepayment transactions.
    - Updated definition of “Enrolled Smart Meter” to reference the term “Enrolled” in the Smart Energy Code.

  - New definition of “Large Gas Meter”.
  - Remove definition of “Quantum Meter” as this isn’t used in the Code.
- Metering Operations Schedule
  - Add new General Requirement for CT Ratio and VT Ratio values to conform to the valid set published by BSCCo to reflect the solution introduced by CP1530.
  - Add a new process for Electricity Change of Supplier (No Meter) to reflect the solution introduced by CP1534.
  - Corrected references to ‘D0213’ in 18.8.11, 18.8.12 and 18.8.13 to reference ‘D0312’.
- MRA Transition Schedule
  - Add a new Appendix 2 for MPAS Provider Non-Functional Requirements to reflect previous provisions on MRA Schedule 6 - Appendix 1.
  - Correct erroneous reference to escalations being sent by email in Appendix B of Section 16, to reference use of the Secure Data Exchange Portal.
- Prepayment Arrangements Schedule
  - Updated interface table in Paragraph 9.1 to reflect the solution introduced by MAP CP 0339 (Changes to MAP 14 to incorporate a procedure for working Unallocated Transactions).
- SPAA Transition Schedule
  - Added new Paragraph 12 to include former SPAA Schedule 45 (Transmission of Transporter Distributed Payments to Consumers) introduced by SCP 476.
- Data Access Schedule, Performance Assurance Schedule, Unbilled Energy Code of Practice, Charging Methodology and Metering Accreditation Schedule
  - Correct typographical errors.

The following changes have been proposed to the Data Specification:

- Standards Definition
  - Addition of Meter Administrator as a new Market Data Service to reflect the solution introduced by DTC CP 3578.
- Market Message Catalogue
  - Amendments to D0268, D0150 and D0313 to reflect the solution introduced by DTC CP 3572.
  - Amendments to D0379 to reflect the solution introduced by DTC CP 3578.
- Data Item Catalogue
  - Amendments to J0385 and introduction of new Data Items J2263, J2264, J2265 and J2266 to reflect solution introduced by DTC CP 3572.
- Addition New Documents:

- Addition of S Number Format formerly set out in Schedule 5 of the MRA.
- Addition of treatment of remotely retrieved meter readings from SMETS2+ gas meters formerly set out in Appendix 1 of Schedule 18 (Market Domain Data) to the SPAA.

The following changes have been proposed to the Service Specification:

- Electricity Enquiry Service Definition
  - Addition of missing report currently provided to the Code Manager.
  - Correction of typographical error.

The five Change Proposals that are missing from the REC V2 drafting had impacts on a number of Market Participants which is summarised in the table below. For the avoidance of doubt, these Change Proposals have already been implemented and are in operation and this Change Proposal does not seek to introduce new obligations on Market Participants:

CHANGE PROPOSAL	IMPACTED MARKET PARTICIPANTS
BSC CP1530 – Introduction of a formalised process for the validation of measurement transformer ratios by Elexon	• Electricity Metering Equipment Managers • Distribution Network Operators • Electricity Suppliers • Data Collectors • BSCCo
BSC CP1534 – Introduce Change of Supplier (CoS) – No Meter Process	• Electricity Suppliers • Electricity Metering Equipment Managers • Distribution Network Operators • Data Collectors
SPAA CP 509 – Changes to Backstop Date	• Gas Suppliers • Gas PPMIP
SPAA CP 476 – Obligations to pass Transporter compensation payments received from Shippers on to consumers	• Gas Suppliers • Gas Transporters
DTC CP 3572 – Changes to the D0268 (Half Hour Meter Technical Details)	• Electricity Metering Equipment Managers • Distribution Network Operators • Electricity Suppliers • Data Collectors
DTC CP 3578 – Sending UMS HH data from the Meter Administrator to HHDC	• Meter Administrators • Data Collectors
MAP CP 0339 - Changes to MAP 14 to incorporate a procedure for working Unallocated Transactions	• Electricity Suppliers • Electricity PPMIPs • Electricity Metering Equipment Managers

6 DRAFT LEGAL TEXT

The legal text changes to deliver the proposed solution to R0012 can be found on the Change Proposal Page in the REC Portal or the Change Set in the EMAR.

7 PROPOSED IMPLEMENTATION DATE AND APPROACH

PROPOSED IMPLEMENTATION DATE	31 January 2022

PROPOSED IMPLEMENTATION APPROACH	BIG BANG

We originally proposed that this change is implemented in the next available standard REC release on 24 February 2022 as the next available REC release to correct these errors and omissions from the REC. In the consultation, we sought views on whether this should be implemented in an earlier, non-standard release. There was general support and no opposition to this proposal, therefore we are proposing that this change is implemented on 31 January 2022. This will align with the proposed implementation date for R0020 – ETTOS Report Dissemination, which is also seeking an urgent release date.

8 CHANGE PATH

CHANGE PATH	SELF-GOVERNANCE

9 RESPONSIBLE COMMITTEE

RESPONSIBLE COMMITTEE	CHANGE PANEL

10 SUMMARY OF CONSULTATION RESPONSES

A consultation was issued on 17 November 2021 to obtain views on the Preliminary Change Report. In total five responses were received from two Distribution Network Operators, two Energy Suppliers and one Metering Equipment Manager / Trade Association. We also received a late representation from another Distribution Network Operator after the consultation had closed. The respondent said “we agree with all the questions however we believe that the reference in para 2.5 to BS7799 should be replaced by ISO27001.”. This refers to Paragraph 2.5 of Appendix 2 in the MRA Transition Schedule. We agree with this comment, that this reference to BS 7799 should be updated to reference ISO 27001. However, the intention of this

Change Proposal isn't to make changes to existing drafting and is not proposing changes to the previously agreed baseline. These provisions will transfer to the Balancing and Settlement Code (BSC) as part of the Switching Programme Significant Code Review (SCR), so there is an opportunity to update this drafting when this is implemented in the BSC. We have passed these comments to Elexon for them to consider whether to incorporate this change in the BSC.

The full set of non-confidential responses can be found in Appendix 2. The key themes from these responses have been summarised and set out below.

10.1 SUMMARY OF RESPONSES

10.1.1 COMMENTS ON THE SOLUTION

All respondents agreed with the proposed solution and did not have any comments in relation to this.

10.1.2 IMPLEMENTATION DATE AND TECHNIQUE

Three respondents responded that they would support an earlier implementation date for this Change Proposal. Two respondents indicated they agreed with the proposed implementation date but did not comment on the potential for an earlier implementation date. We have amended the proposed implementation date to 31 January 2022 so this is implemented earlier, but aligned with the proposed release date for R0020 (ETTOS Report Dissemination) to create efficiencies in the release.

10.1.3 CASE FOR CHANGE AND CODE MANAGER'S RECOMMENDATION

All respondents agreed with the Code Manager's recommendation that this change should be approved for implementation.

10.1.4 OTHER COMMENTS

One respondent highlighted that they found it difficult to review the draft changes and particularly those relevant to the former DTC CP 3572 (Changes to the D0268). We are in the process of making changes to the layout of the Data Specification that will improve the useability of this in the future.

11 SUMMARY OF AMENDMENTS MADE FOLLOWING CONSULTATION

DOCUMENT	SECTION	AMENDMENT	REASON
Legal Text (Metering Operations Schedule)	18.8.11, 18.8.12, 18.8.13	Change to solution	Updated to correct erroneous references to 'D0213' which should be 'D0312'.
Final Change Report	5 (Proposed Solution)	Change to solution	Updated to correct erroneous references to 'D0213' which should be 'D0312'.
Final Change Report	7 (Proposed Implementation Date and Approach)	Change to implementation date	Amended implementation date to 31 January 2022

12 BUSINESS CASE ASSESSMENT

There is no additional cost or impact identified from this change, and this reflects the original policy intention of the Switching Programme in designating REC v2.0.

Market Participants and Service Providers have already implemented the Change Proposals that are missing from the REC drafting, when they were implemented in previous codes. The correction of these omissions, and other typographical errors, will ensure that the REC reflects the current market arrangements and remove the risk of new Market Participants interpreting their requirements incorrectly.

As there is no cost associated with this Change Proposal, and it will improve the accuracy and clarity of the REC, we are satisfied that a positive business case exists for correcting this and implementing this Change Proposal.

13 CASE FOR CHANGE

The Code Manager considers that there is a positive case for change to implement this Change Proposal, on the basis that:

- The proposed solution is fully formed and appropriately resolves the problem statement.
- There are no identified additional costs to the market in implementing the proposed solution.
- The impact of not implementing this solution would cause detriment to Market Participants, as the REC would not reflect the current market arrangements and could result in new Market Participants interpreting processes differently to existing Market Participants.
- A positive business case can be made, as detailed in section 12 of this report.

14 CODE MANAGER'S RECOMMENDATION

Based on the evidence in sections 12 and 13 of this report, the Code Manager considers a positive business case can be made for implementing this solution and recommends that the Change Panel:

- **APPROVE** the proposed change solution;
- **APPROVE** the proposed implementation approach; and
- **APPROVE** the proposed implementation date of 31 January 2022.

15 APPENDIX 1 – LINKS

CHANGE PROPOSAL	Change Proposal Page
LEGAL DRAFTING	Change Set (Clean)

16 APPENDIX 2 – CONSOLIDATED CONSULTATION RESPONSES

QUESTION	RESPONDENT DETAILS	RESPONSE	CODE MANAGER COMMENTS
Do you agree with the proposed solution? If not, please explain why?	**Utilita Energy Limited** Energy Supplier	Yes, we agree	
	Scottish Power Energy Networks Distribution Network Operator	Yes, SPEN agree that the relevant areas require update to the REC as part of a housekeeping exercise.	
	EDF Energy Supplier	Yes – we agree that the REC should reflect the changes that were agreed and implemented under the previous codes. REC Parties will have assumed that obligations will have been 'lifted and shifted' to the REC; they may be operating in a way that is not consistent with the REC as a result of these omissions.	

	Association of Meter Operators Metering Equipment Manager	Yes	
	Western Power Distribution Distribution Network Operator	Yes we are in agreement with the proposed solution	
If approved, should this Change Proposal be implemented as part of the standard REC release on 24th February 2022, or earlier as an urgent release?	**Utilita Energy Limited** Energy Supplier	Earlier than the 24th February 2021 is preferable as the current REC v.2 that went live on the 1st of September is technically incorrect. As best practice proposals for important housekeeping changes should be updated as soon as possible, but not to the added cost of the supplier and their Energy Consumer.	The proposed implementation date has been amended to 31 January 2022.
	Scottish Power Energy Networks Distribution Network Operator	Our preference would be that this is implemented earlier than February 2022, as there are a number of operational areas covered in this update, and there is scope for misinterpretation if looking solely at the REC. However, if this cannot be achieved, we are supportive of the 24/02/2022 date for implementation, as these processes are already approved, and participants should be compliant with the changes from the previous code.	The proposed implementation date has been amended to 31 January 2022.

	EDF Energy Supplier	We would recommend that this Change Proposal is implemented as an Urgent Release ahead of the 24th February 2022. While we are not aware that any material issues have arisen as a result of the errors and omissions that this Change Proposal is seeking to address, it is possible that issues may arise as a result of the REC not reflecting the changes that were implemented or the incorrect text noted.	The proposed implementation date has been amended to 31 January 2022.
	Association of Meter Operators Metering Equipment Manager	Yes	
	Western Power Distribution Distribution Network Operator	We agree with the proposed implementation date	
Do you agree with the Code Manager's assessment of the Change Path, that this Change Proposal should be subject to Self-Governance approval by the Change Panel?	**Utilita Energy Limited** Energy Supplier	Yes, we agree	
	Scottish Power Energy Networks Distribution Network Operator	Considering the documentation indicating that these changes have already been implemented under other codes we would agree that this should follow the self-governance path.	
	EDF Energy Supplier	Yes, we agree that this Change Proposal should be subject to Self-Governance and approved by the Change Panel.	

	Association of Meter Operators Metering Equipment Manager	Yes	
	Western Power Distribution Distribution Network Operator	Yes we agree with the Code Manager's assessment of the Change Path	
Do you agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation? If not, please explain why?	**Utilita Energy Limited** Energy Supplier	Yes, we agree	
	Scottish Power Energy Networks Distribution Network Operator	Yes	
	EDF Energy Supplier	Yes, we agree with the Code Manager's recommendation that this Change Proposal should be approved for implementation?	
	Association of Meter Operators Metering Equipment Manager	Yes	
	Western Power Distribution Distribution Network Operator	Yes we agree with the Code Manager's recommendation that this CP should be approved for implementation	
Do you have any other comments relating to this Change Proposal?	**Utilita Energy Limited** Energy Supplier	No	
	Scottish Power Energy Networks Distribution Network Operator	None	

	EDF Energy Supplier	No.	
	Association of Meter Operators Metering Equipment Manager	**No response**	
	Western Power Distribution Distribution Network Operator	Whilst we have indicated our agreement and support of this change proposal, we found that reviewing the changes very challenging. We attempted to review the original MRA DTC CP 3572 changes and cross reference them to the red-lined changes in the legal text and found the format of the document difficult to follow.	Thank you for the feedback. We are in the process of making changes to the layout of the Data Specification that will improve the useability of this in the future.